

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**STEPHEN MARESCA,  
HEATHER MARTIN-MARESCA,  
M.M., C.M., and ANTHONY MARESCA,**

**Plaintiffs,**

**v.**

**No. 13-CV-00733 PJK/KBM**

**BERNALILLO COUNTY, and  
BERNALILLO COUNTY SHERIFF OFFICERS  
DEPUTY J. FUENTES, DEPUTY G. GRUNDHOFFER,  
DEPUTY L. TONNA, DEPUTY E. LUCERO,  
DEPUTY L. SWINT, and DEPUTY S. QUINTANA,**

**Defendants.**

**DEFENDANTS' UNOPPOSED MOTION TO EXTEND  
EXPERT WITNESS DEADLINES**

COME NOW defendants Bernalillo County, Deputy J. Fuentes, Deputy G. Grundhoffer, Deputy L. Tonna, Deputy E. Lucero, Deputy L. Swint and Deputy S. Quintana (hereinafter "defendants"), by and through counsel of record, Kennedy, Moulton & Wells, P.C., by Deborah D. Wells, and hereby move this Court for an Order allowing defendants an extension of time within which to disclose expert witness(es) to **April 14, 2014**.

Plaintiffs' counsel has been contacted and has no objection to this motion.

If the unopposed motion is granted, the extension of defendant's deadline to disclose expert witness(es) will not impact any other pretrial deadlines. Jury trial is not scheduled to commence until January 5, 2015. Additionally, defendants' request for an extension of the expert witness deadlines in this case does not conflict with the Civil Justice Reform Act.

On March 26, 2014, all counsel of record approved this motion, as well as the Stipulated Order, via e-mail. The Stipulated Order was then submitted, upon this Motion's filing, to the Honorable Karen B. Molzen.

WHEREFORE, defendants respectfully request, and plaintiffs do not object to entry of a stipulated Case Management Order which extends the deadline for defendants to identify their expert witness(es) and provide their expert reports until **April 14, 2014**.

Respectfully submitted,

KENNEDY, MOULTON & WELLS, P.C.

/s/ Electronically by Deborah D. Wells

DEBORAH D. WELLS

Attorney for defendants

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I HEREBY CERTIFY that a true  
and correct copy of the  
foregoing was transmitted via CM/ECF to:

Joseph Kennedy, Esq.  
Shannon Kennedy, Esq.  
Theresa Hacsí, Esq.  
1000 2<sup>nd</sup> Street N.W.  
Albuquerque, NM 87102  
(505) 244-1400

on this 26th day of March, 2014.

/s/ Electronically by Deborah D. Wells

DEBORAH D. WELLS